

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

NELSON L. BRUCE,

Plaintiff,

v.

EQUIFAX INFORMATION SERVICES,
LLC, EXPERIAN INFORMATION
SOLUTIONS, INC., TRANS UNION, LLC,
and UNKNOWN DOES 1-100

Defendants.

CASE NO.: 2:21-cv-03603-BHH-MGB

**DEFENDANT TRANS UNION LLC'S RESPONSE TO
PLAINTIFF'S REPLY AND OBJECTIONS TO TRANS UNION'S
ANSWER AND DEFENSES TO PLAINTIFF'S SUPPLEMENTAL COMPLAINT**

COMES NOW, Trans Union LLC (“Trans Union”), and files its Response to Plaintiff Nelson L. Bruce’s (“Plaintiff”) Reply and Objections to Trans Union’s Answer and Defenses to Plaintiff’s Supplemental Complaint (“Reply”) and would respectfully show the Court as follows:

1. On August 5, 2022, Trans Union filed its Answer and Defenses to Plaintiff’s Supplemental Complaint [ECF No. 69].
2. Plaintiff filed his Reply on August 15, 2022 [ECF No. 73]. Such Reply is improper under the Federal Rules of Civil Procedure, and the relief sought in the Reply is not supported by any authority.

Respectfully Submitted,

s/ Wilbur E. Johnson

Wilbur E. Johnson, Federal ID No.: 2212
Clement Rivers, LLP
25 Calhoun Street, Suite 400
Charleston, SC 29401
Tel: (843) 724-6659
Email: wjohnson@ycrlaw.com
Counsel for Trans Union LLC

CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of August 2022, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to counsel of record registered to use the CM/ECF system in this action, as follows:

Rita Bolt Barker
rbarker@wyche.com
Wyche PA
200 E Camperdown Way
Greenville, SC 29601
***Counsel for Equifax Information Solutions,
LLC***

Lyndey Ritz Zwing Bryant
lyndey.bryant@arlaw.com
Luke Montgomery Allen
luke.allen@arlaw.com
Adams and Reese LLP
1501 Main Street, Fifth Floor
Columbia, SC 29201
***Counsel for Experian Information Solutions,
Inc.***

I further certify that I forwarded a copy of the foregoing by U.S. First Class Mail to the following non-CM/ECF participants:

Nelson L. Bruce
PO BOX 3345
Summerville, SC 29484-3345
Pro Se Plaintiff

s/ Wilbur E. Johnson
WILBUR E. JOHNSON